

MEMO ENDORSED

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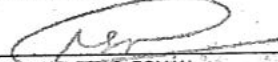
March 8, 2024

BY ECF

The Honorable Nelson S. Román  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**The parties' request is GRANTED. All proceedings are stayed until June 6, 2024. The Parties are directed to submit a joint status report on the progress of settlement on June 6, 2024. Alternatively, if settlement is reached, the parties shall notify the Court in writing by that date. The Clerk of the Court is directed to terminate the motion at ECF No. 20.**

SO ORDERED:

  
HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE

Dated: March 11, 2024

White Plains, NY

*Jane Doe 1, et al. v. Palpung Thubten Chöling,  
f/k/a Kagyu Thubten Chöling, Civ. A. No. 23-10117-NSR*

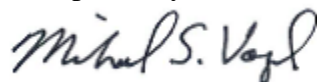
Dear Judge Román:

My firm represents Defendant Palpung Thubten Chöling, f/k/a Kagyu Thubten Chöling ("PTC") and we write with the consent of counsel for Plaintiffs Jane Doe 1, Jane Doe 2, and Jane Doe 3 (together, "Plaintiffs").

Earlier today, PTC filed its Answer to the Complaint. In the interests of efficiency and judicial economy, PTC and Plaintiffs jointly request a ninety (90) day stay of all proceedings in this action in order to provide the parties sufficient time to engage in settlement discussions. There have been no previous requests to stay proceedings and, currently, there is no scheduling order in place, nor has a preliminary conference been scheduled. (There has been one previous request for an extension of PTC's time to respond to Plaintiff's Complaint to March 8, 2024, which was granted.) The parties respectfully submit that a stay of this length is necessary because of the complexities of this matter, which involves multiple Plaintiffs and allegations going back to the 1980s and in some instances earlier. Accordingly, we respectfully ask the Court to stay the proceedings for ninety days, up to and including June 6, 2024.

We thank the Court for its consideration of this request.

Respectfully submitted,



Michael S. Vogel

cc: All counsel of record (by ECF)